

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI

In Re: )  
 ) Case No. 22-41362  
KOBI GILKEY, )  
 ) Chapter 13 Bankruptcy  
Debtor. )

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

COMES NOW Debtor, by and through counsel, and in response to Trustee's Motion states as follows:

1. Debtor admits the allegations in paragraphs 1, 2, 3, 4, and 5 of Trustee's Motion to Dismiss.
2. Further, undersigned counsel is attempting to contact Debtor concerning payments, and respectfully requests a hearing on the Trustee's Motion to Dismiss.

WHEREFORE, having fully answered, Debtor requests this Court allow additional time for Attorney to contact Debtor, so that Debtor may become current in his payments, and for such other and further relief as this Court may deem just and equitable.

By: /s/Robert E. Faerber  
Robert E. Faerber, #46794MO  
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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was filed electronically on December 16, 2022 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

Diana S. Daugherty (standing\_trustee@ch13stl.com)  
Office of U.S. Trustee (USTPRegion13.SL.ECF@USDOT.gov)

/s/Robert E. Faerber